

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

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**IN RE: CENTURYLINK SALES  
PRACTICES AND SECURITIES  
LITIGATION**

**MDL No. 17-2795 (MJD/KMM)**

This Document Relates to:

Civil Action No. 18-296 (MJD/KMM)

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**DECLARATION OF PATRICK GIBBS IN SUPPORT OF  
DEFENDANTS' MOTION TO DISMISS PLAINTIFFS' CONSOLIDATED  
SECURITIES CLASS ACTION COMPLAINT**

Patrick Gibbs makes the following declaration under 28 U.S.C. § 1746:

1. My name is Patrick Gibbs and I am a partner with the law firm of Cooley LLP. I am a member in good standing of the bars of California and Illinois.
2. I submit this Declaration in support of CenturyLink, Inc ("CenturyLink"), Glen F. Post, III, R. Stewart Ewing, Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey's Motion to Dismiss Plaintiffs' Consolidated Securities Class Action Complaint.
3. I have personal knowledge of the documents attached to this Declaration and I declare that the attached copies are true and correct copies of the documents they purport to be.
4. Attached as Exhibits 1-27 are true and correct copies of the following documents:  
  
EXHIBIT 1: An excerpt of CenturyLink's Form 10-K for the fiscal year ending on December 31, 2013, filed on February 27, 2014 with the Securities Exchange Commission ("SEC")

- EXHIBIT 2: An excerpt of CenturyLink's Form 10-K for the fiscal year ending on December 31, 2014, filed on February 24, 2015 with the SEC
- EXHIBIT 3: An excerpt of CenturyLink's Form 10-K for the fiscal year ending on December 31, 2015, filed on February 25, 2016 with the SEC
- EXHIBIT 4: An excerpt of CenturyLink's Form 10-K for the fiscal year ending on December 31, 2016 filed on February 23, 2017 with the SEC
- EXHIBIT 5: An excerpt of CenturyLink's Form 10-K for the fiscal year ending on December 31, 2017, filed on March 1, 2018 with the SEC
- EXHIBIT 6: An excerpt of CenturyLink's Form 10-Q for the quarterly period ending on March 31, 2013, filed on May 10, 2013 with the SEC
- EXHIBIT 7: An excerpt of CenturyLink's Form 10-Q for the quarterly period ending on June 30, 2013, filed on August 8, 2013 with the SEC
- EXHIBIT 8: An excerpt of CenturyLink's Form 10-Q for the quarterly period ending on September 30, 2013, filed on November 8, 2013 with the SEC
- EXHIBIT 9: An excerpt of CenturyLink's Form 10-Q for the quarterly period ending on March 31, 2014, filed on May 9, 2014 with the SEC
- EXHIBIT 10: An excerpt of CenturyLink's Form 10-Q for the quarterly period ending on June 30, 2014, filed on August 7, 2014 with the SEC
- EXHIBIT 11: An excerpt of CenturyLink's Form 10-Q for the quarterly period ending on September 30, 2014, filed on November 6, 2014 with the SEC
- EXHIBIT 12: An excerpt of CenturyLink's Form 10-Q for the quarterly period ending on March 31, 2015, filed on May 6, 2015 with the SEC
- EXHIBIT 13: An excerpt of CenturyLink's Form 10-Q for the quarterly period ending on June 30, 2015, filed on August 6, 2015 with the SEC
- EXHIBIT 14: An excerpt of CenturyLink's Form 10-Q for the quarterly period ending on September 30, 2015, filed on November 5, 2015 with the SEC
- EXHIBIT 15: An excerpt of CenturyLink's Form 10-Q for the quarterly period ending on March 31, 2016, filed on May 5, 2016 with the SEC
- EXHIBIT 16: An excerpt of CenturyLink's Form 10-Q for the quarterly period ending on June 30, 2016, filed on August 4, 2016 with the SEC

- EXHIBIT 17: An excerpt of CenturyLink's Form 10-Q for the quarterly period ending on September 30, 2016, filed on November 4, 2016 with the SEC
- EXHIBIT 18: An excerpt of CenturyLink's Form 10-Q for the quarterly period ending on March 31, 2017, filed on May 5, 2017 with the SEC
- EXHIBIT 19: An excerpt of CenturyLink's Form 10-Q for the quarterly period ending on June 30, 2017, filed on August 7, 2017 with the SEC
- EXHIBIT 20: An excerpt of CenturyLink's Form 10-Q for the quarterly period ending on September 30, 2017, filed on November 9, 2017 with the SEC
- EXHIBIT 21: CenturyLink's Code of Conduct, *available at* [http://www.centurylink.com/static/PDF/AboutUs/Governance/Code\\_of\\_Conduct.pdf](http://www.centurylink.com/static/PDF/AboutUs/Governance/Code_of_Conduct.pdf)
- EXHIBIT 22: Heidi Heiser Complaint filed in *Heiser v. CenturyLink, Inc.*, No. CV2017-008928 (Maricopa Cty. Super. Ct.)
- EXHIBIT 23: *Bloomberg* publication by Mosendz and Moritz titled *CenturyLink Is Accused of Running a Wells Fargo-Like Scheme*, dated June 16, 2017, *available at* <https://www.bloomberg.com/news/articles/2017-06-16/centurylink-is-accused-of-running-wells-fargo-like-scheme>
- EXHIBIT 24: Assurance of Discontinuance and Approval for In the Matter of Qwest Corporation, d/b/a/ CenturyLink QC, No. CV2016-002842 (Maricopa Cty. Super. Ct. Apr. 4, 2016)
- EXHIBIT 25: Public Utilities Commission of the State of California Revised General Order 168 titled *Market Rules to Empower Telecommunications Consumers and to Prevent Fraud* (Decision 06-03-013 in Rulemaking 00-02-004)
- EXHIBIT 26: Internal CenturyLink email dated May 23, 2015 between Clay Bailey and FE-5 (FILED UNDER SEAL)
- EXHIBIT 26: Internal CenturyLink email dated May 23, 2015 between Clay Bailey and FE-5 (REDACTED)
- EXHIBIT 27: Summary Exhibit identifying all challenged statements in Plaintiffs' Consolidated Securities Action Complaint, filed on June 26, 2018 (Docket No. 143)

Dated: August 31, 2018

Respectfully submitted,

/s/ Patrick E. Gibbs

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